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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF CAMILA  
TAPERNOUX IN SUPPORT OF  
DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S RESPONSE TO  
WAYMO'S PRECIS IN SUPPORT OF  
ITS REQUEST TO FILE A MOTION  
FOR RELIEF BASED ON  
DEFENDANTS' LITIGATION  
MISCONDUCT**

Trial Date: February 5, 2018

1 I, Camila Tapernoux, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in  
3 good standing of the Bar of the State of California. I make this declaration based on personal  
4 knowledge and, if called as a witness, I could and would testify competently to the matters set  
5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and  
6 Ottomotto LLC's ("Uber") Response to Waymo's Precis in Support of Its Request to File a  
7 Motion for Relief Based on Defendants' Litigation Misconduct.

8 2. Attached hereto as **Exhibit A** are relevant pages from the deposition of  
9 Craig Clark, taken on December 22, 2017.

10 3. Attached hereto as **Exhibit B** are relevant pages from the deposition of  
11 Kevin Maher, taken on December 12, 2017.

12 4. Attached hereto as **Exhibit C** are relevant pages from the 30(b)(6) deposition of  
13 Randy Haimovici, taken on December 21, 2017.

14 5. Attached hereto as **Exhibit D** are relevant pages from the deposition of Salle Yoo,  
15 taken on December 14, 2017.

16 6. Attached hereto as **Exhibit E** are relevant pages from the deposition of Lior Ron,  
17 taken on December 12, 2017.

18 7. Attached hereto as **Exhibit F** are relevant pages from the deposition of  
19 Scott Johnston, taken on December 14, 2017.

20 8. Attached hereto as **Exhibit G** is a true and correct copy a document produced in  
21 this litigation bearing Bates numbers WAYMO-UBER-00145156—WAYMO-UBER-00145157.

22 9. Attached hereto as **Exhibit H** is a true and correct copy a document produced in  
23 this litigation bearing Bates numbers WAYMO-UBER-00145114—WAYMO-UBER-00145127.

24 10. Attached hereto as **Exhibit I** is a true and correct copy of the transcript of Motions  
25 Hearing in *Function Media, LLC v. Google, Inc.*, No. 2007-CV-279, No. 483 (E.D. Tex. Oct. 21,  
26 2010).

27 11. Attached hereto as **Exhibit J** are relevant pages from the deposition of  
28 Edward Russo, taken on December 20, 2017.



**ATTESTATION OF E-FILED SIGNATURE**

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Camila Tapernoux has concurred in this filing.

Dated: January 14, 2018

/s/ Arturo J. González

ARTURO J. GONZÁLEZ